

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

COLTON JURISIC,

Defendant.

_____ /

HON. DENISE PAGE HOOD

CASE NO. 19-20246

MOTION TO MODIFY BOND REQUIREMENT

NOW COMES the Defendant, Colton Jurisic, by and through his attorney, Steven Scharg, and respectfully requests that this Honorable Court to modify a term of the bond for the following reasons:

1. Defendant was arraigned on the Indictment on May 16, 2019 before Magistrate Elizabeth Stafford.
2. Defendant was charged in Count One: Conspiracy to Commit Wire Fraud pursuant to 18 U.S.C. Section 1349; Count Six: Wire Fraud, Aiding and Abetting pursuant to 18 U.S.C. Section 1343 and 2; Count Seven: Aggravated Identity Theft pursuant to 18 U.S.C. Section 1028A(a)(1) and 2; Count Ten: Wire Fraud Aiding and Abetting pursuant to 18 U.S.C. Section 1343 and 2; Count Eleven: Aggravated Identity Theft pursuant to 18 U.S.C. Section 1028A(a)(1) and 2; Count Fourteen: Wire Fraud Aiding and Abetting pursuant and Count Fifteen: Aggravated Identity Theft pursuant to 18 U.S.C. Section 1028A(a)(1) and 2.
3. At the Detention Hearing on May 16, 2019, the Government consented to

bond but also requested a condition of bond that Defendant be placed on GPS electronic monitoring.

4. The Government was concerned that Defendant would engage in further internet criminal activity by going to a library or some other location and using a computer. The Magistrate ordered as part of his bond that he could not have any contact, "direct or indirect", no text messaging, no emailing, or even calling any Defendant in this case or any alleged victims.

5. Defendant is 19 years old and has no prior convictions, no prior police contact, and definitely not a flight risk.

6. Defendant believes that the GPS tether is unnecessary since his pretrial officer in Iowa has immediate access to his cell phone when requested, he had to remove all of his internet programs from his cell phone, he cannot have a computer in his home, and his pretrial officer has access to search his home at will.

7. Defense counsel has sought the concurrence of the assigned AUSA, Tim Wyse, in the present matter, and it has been denied.

Wherefore, Defendant, Colton Jurisic, respectfully requests that this Honorable Court to enter an Order modifying his bond that the GPS tether is removed.

Respectfully submitted,

s/Steven Scharg
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Dated: July 15, 2019

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2019, I filed this motion and served a copy of said filing by ecf filing to Assistant U.S. Attorney, Tim Wyse, at timothy.wyse@usdoj.gov

s/Steven Scharg
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Dated: January 7, 2019